

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

CITIBANK, N.A., AS TRUSTEE FOR
AMERICAN HOME MORTGAGE ASSETS
TRUST 2006-3, MORTGAGE BACKED
PASS-THROUGH CERTIFICATES SERIES
2006-3,

Plaintiff,

v.

KATHERINE L. CAITO,

Defendant,

v.

INTERNAL REVENUE SERVICE,

Interested Party.

C.A. No. 1:18-cv-00427-JJM

SECOND MOTION TO EXTEND DEADLINE TO CONDUCT SALE

Plaintiff, Citibank, N.A., as Trustee for American Home Mortgage Assets Trust 2006-3, Mortgage Backed Pass-Through Certificates Series 2006-3 (“Plaintiff”), requests a further extension of the deadline to conduct a public sale set in the January 27, 2020 Judgment entered in their favor so that foreclosure of property located at 16 Yosemite Valley Road Westerly, Rhode Island (the “Property”) may proceed to sale.

The Court previously extended the sale deadline by 120 days by text order issued on April 19, 2023 in response to Plaintiff’s Motion for Extension of Time. (ECF No. 62.) That 120 day deadline required Plaintiff to conduct the sale by August 17, 2023. The Plaintiff, by and through their local foreclosure counsel, has diligently pursued all efforts toward the sale in order to comply with Rhode Island law. The Plaintiff has run into some delay in responding to a series of qualified

written requests, which defendant Katherine L. Caito (“Defendant”) served on Plaintiff’s mortgage loan servicer.

At present, the foreclosure sale is scheduled for September 8, 2023 at 10:00am. As a result, Plaintiff is requesting an extension of the sale deadline to September 30, 2023 so that the foreclosure sale (and any adjournment) can be completed in conformance with this Court’s timelines.

Accordingly, the Plaintiff requests the following relief:

1. Plaintiff is hereby authorized to conduct a public sale of the Property pursuant to the January 27, 2020 Judgment no later than September 30, 2023 except as otherwise ordered, modified or extended by the Court with Plaintiff publishing and giving notice of such sale to such persons and in such manner as provided for in R.I. Gen. Laws §34-27-4(a) and 4(b) respectively.

Plaintiff further requests that all other provisions within the January 27, 2020 order remain in place.

Respectfully submitted,

CITIBANK, N.A., AS TRUSTEE FOR
AMERICAN HOME MORTGAGE
ASSETS TRUST 2006-3,
MORTGAGE BACKED PASS-
THROUGH CERTIFICATES SERIES
2006-3,

By Its Attorneys,

/s/ Samuel C. Bodurtha

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Dated: July 28, 2023

CERTIFICATE OF SERVICE

I, Samuel C. Bodurtha, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on July 28, 2023.

/s/ Samuel C. Bodurtha

Samuel C. Bodurtha